

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW
40 EXCHANGE PLACE
18TH FLOOR
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE
(212) 482-1303 FAX
WWW.TALKINLAW.COM
EMAIL: INFO@TALKINLAW.COM

MEMO ENDORSED

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLICOTT CITY, MD 21042
410-964-0300

NEW JERSEY OFFICE:
2500 PLAZA 5
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311
201-342-6665

November 20, 2023

Honorable Jessica G. L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Application GRANTED. The initial conference scheduled for November 30, 2023 is ADJOURNED to February 29, 2024 at 11:00 a.m. in Courtroom 20C, 500 Pearl Street, New York, New York. The Court finds that the ends of justice served by excluding the time between November 30, 2023 and February 29, 2024, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because, among other things, the parties are presently engaged in discussions regarding a potential disposition of this matter and the exclusion would allow for those discussions to continue. It is hereby ORDERED that the time between November 30, 2023 and February 29, 2024, is excluded.

Dated: November 21, 2023
New York, New York

SO ORDERED.


JESSICA G. L. CLARKE
United States District Judge

BY ECF

Dear Judge Clarke:

Re: United States v. Joseph Malvasio & Gregg Marcus
23 Cr. 396 (JGLC)

A conference in the above referenced case is currently scheduled for November 30, 2023. Defendants Joseph Malvasio and Gregg Marcus (the “defense”) have begun reviewing the voluminous discovery in this case. However, efficient review of the terabytes of information disclosed by the government also requires the retention of a discovery review vendor. The defense has identified a vendor and the discovery will be loaded on a review platform in the immediate near future. The defense anticipates a period of at least ninety days from the scheduled conference will be necessary for enough discovery review to be completed to be in a position to inform the Court whether pretrial motions will be filed in this case. For this reason, the defense respectfully requests an adjournment to a date convenient to the Court that is approximately ninety past November 30, 2023 to allow for this discovery review.

The government, by Assistant United States Attorney Jaclyn Delligatti, consents to this application and the defense consents to the period of time of the requested adjournment being excluded from Speedy Trial Act, 18 U.S.C § 3161, calculation. Thank you for Your Honor’s consideration of this request.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Jaclyn Delligatti (by ECF)
All counsel (by ECF)